

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT-21-MJ-2771-MBB

I, Geoffrey J. Kelly, being duly sworn, state that the following is true to the best of my knowledge, information, and belief:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for twenty-six years. Prior to my employment with the FBI, I served for three years as a police officer with the Metropolitan Transportation Authority Police Department in New York City. Since February 1996, I have been assigned to the Boston Division of the FBI. I am currently assigned to the Lakeville Resident Agency in Lakeville, Massachusetts, where my primary duty is the investigation of violent criminal offenses, to include offenses involving the interstate transportation of stolen property. Prior to my current assignment, I worked for approximately eight years on the Boston FBI's Violent Crimes Task Force. Throughout my career, I have participated in hundreds of violent crime investigations and during these investigations, I have executed search and arrest warrants, utilized informants, interviewed witnesses, and conducted surveillances.

2. Based on my training and experience, I am aware that Title 18 of the United States Code, §2314, makes it a crime for anyone to transport in interstate commerce goods, wares, or merchandise valued at \$5,000 or more, knowing the same to have been stolen; and that Title 18 of the United States Code, § 371, makes it a crime to conspire to commit such an offense.

3. I make this affidavit in support of a criminal complaint charging each of the defendants with the following:

a. Ronald PATTERSON, Jr. ("PATTERSON") date of birth: XX/XX/1990, with violations of 18 U.S.C. § 371, conspiracy, and 18 U.S.C. § 2314, transportation of stolen materials in interstate commerce, which occurred on or about the following date:

i. September 17, 2021 in Wrentham, Massachusetts.

b. late of birth: XX/XX/1990, with violations of 18 U.S.C. § 371, conspiracy, and 18 U.S.C. § 2314, transportation of stolen materials in interstate commerce, which occurred on or about the following date:

i. September 17, 2021 in Wrentham, Massachusetts.

c. Linworth Hayes CRAWFORD III, date of birth: XX/XX/1994, with violations of 18 U.S.C. § 371, conspiracy, and 18 U.S.C. § 2314, transportation of stolen materials in interstate commerce, which occurred on or about the following date:

i. September 17, 2021 in Wrentham, Massachusetts.

4. The facts stated herein are based on my own personal involvement with this investigation, as well as from information provided to me by other law enforcement officers involved in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation; I am only submitting enough evidence necessary to establish the requisite probable cause.

Commercial Burglary Activity

6. As far back as October 12, 2020, a number of commercial burglaries have occurred at retail establishments in a number of cities and towns throughout the Eastern United States, including Wrentham, Massachusetts. The burglaries targeted retail stores carrying luxury brand merchandise. Based on the method of operation of the subjects responsible for these commercial burglaries ("the burglars"), I believe that these burglaries are all connected. These burglaries all occur late at night and the burglars gain entry to these establishments by breaking the stores' windows and/or doors using a small tool. The burglaries are all very similar because they involve the same brands, Gucci, Burberry, Canada Goose and Moose Knuckles.

**GUCCI BURGLARY
1 Premium Outlet Blvd
Wrentham, MA
September 17, 2021**

7. On September 17, 2021 at approximately 12:24 a.m., Wrentham Police responded to a burglar alarm at the Gucci store, Suite 545 at the Wrentham Village Premium Outlets. Officers arrived on scene and determined that the burglars had gained entry to the store by smashing the glass front door. From a review of video surveillance, it was determined that four suspects entered the store.

8. According to an inventory conducted by store employees in the wake of the burglary, approximately \$32,000 USD in merchandise was stolen.

9. PATTERSON has been identified as a suspect in this burglary based on investigators tying PATTERSON to multiple similar burglaries throughout the country. In the previous year investigators have identified PATTERSON in similar instances via phone records

and his social media posts. On multiple occasions PATTERSON has posted on his “OfferUp”¹ and Instagram accounts items for sale that were identical to merchandise that was stolen during the burglaries that he suspected to have committed.

10. For example, on September 17, 2021, which is the same date as the Gucci burglary, PATTERSON posted on his Instagram account² that he had Gucci bags available for sale. PATTERSON also posted images of the bags for sale, which appeared to be identical to the Gucci bags stolen during the burglary.

11. Subsequent to the Gucci burglary on September 17, 2021, investigators obtained T-Mobile cell phone records for [REDACTED] and Ronald PATTERSON via a state search warrant.

12. As more fully detailed below, those records generally show the phones belonging to [REDACTED] and PATTERSON moving up from the Maryland/Washington D.C. area, and through Connecticut, prior to the burglary. Investigation, also detailed below, revealed that the suspects visited a 7-Eleven and had a tire changed while in Connecticut, an event captured on

¹ According to the company’s website, OfferUp is a peer-to-peer commerce site where local buyers and sellers connect to buy and sell products. Potential buyers can “instantly message sellers securely through the app to negotiate price and set up a time to meet.” (<https://about.offerup.com/our-story/>) (last visited 04/09/2021). PATTERSON’s “OfferUp” account, “RJ_dont_play” had an associated phone number of (202) 631-9954. That information was obtained through the website, LeadsOnline.com, which offers, among other things, access to OfferUp subscriber information.

² Agents believe this is Patterson’s Instagram account because of the numerous pictures of Patterson on this account. It appears Patterson was trying to be a model and law enforcement believes this account is used by him.

surveillance footage described below. The phones then travelled to the area of Wrentham. After the burglary, the phones can be traced to a location in Maryland, a location from which PATTERSON posted a video to Instagram.

13. An examination of phone records, showed that on September 15, 2021 at approximately 8:16 p.m., cell-site information showed one was in the Maryland area and subsequently traveled north. On September 16, 2021 at approximately 3:41 a.m., one was located in Fairfield, Connecticut. The phone remained in the Fairfield, Connecticut area and then at approximately 1:11 p.m., one is located in the immediate area of the Town Fair Tire in Stratford, phone then leaves the Stratford, Connecticut area at approximately 3:11 p.m. and is active in the vicinity of the Wrentham Village Premium Outlets after 5:30 p.m.

14. Between 5:34 p.m. and 5:49 p.m., there are multiple communications between phone and PATTERSON's phone. At 5:49 p.m. there is a thirty second phone call between these two phones. In reviewing surveillance video at the Wrentham Village Outlets, PATTERSON can be identified on video surveillance and seen talking on the phone at the time his phone records also show he is talking to From approximately 6:42 p.m. to 7:03 p.m., phone is located in Mansfield, Massachusetts. From approximately 7:36 p.m. to 11:53 p.m., phone remained located in the Plainville/Wrentham area of Massachusetts. The burglary occurred at approximately 12:20 a.m.

15. At approximately 6:46 a.m. after the burglary, phone is located in the Havre de Grace, Maryland area. At approximately 9:15 a.m., phone is located back in the Washington, D.C./Maryland area.

16. Cell site information for PATTERSON's phone number, 202-631-9954, which had been obtained by state search warrants, showed that the phone had a similar travel pattern as phone: On September 15, 2021 around 8:35 p.m., cell site records showed PATTERSON's phone in the Maryland area and subsequently traveled north. At approximately 3:08 a.m., PATTERSON's phone is located in Fairfield, Connecticut. The phone remains in the Fairfield, Connecticut area and at approximately 1:04 p.m., PATTERSON's phone is located in the area of the Town Fair Tire in Stratford, Connecticut. PATTERSON's phone then travels into Massachusetts. At approximately 7:37 p.m., PATTERSON's phone is communicating with phone. At that time, PATTERSON's phone is located in the area of the Wrentham Village Premium Outlets. PATTERSON's phone remains in the Plainville/Wrentham area though 11:15 p.m.

17. At approximately 6:55 a.m. the following morning, PATTERSON's phone is located in the Havre de Grace, Maryland area. As detailed below, PATTERSON made an Instagram post at 6:55 a.m. while at a Waffle House in Havre de Grace, Maryland. At approximately 9:30 a.m., PATTERSON's phone is located in the Washington, D.C. area.

18. In an effort to track PATTERSON's whereabouts at the times before, during, and after the September 2021 burglary, agents have reviewed posts made on PATTERSON's Instagram. PATTERSON's account is public, and anyone can go online and view it. The posts include Instagram story videos, which are videos made that people could click on to view.

19. On September 16, 2021 at 11:52 a.m., PATTERSON posted a video with the caption "Massachusetts" and videos of fruit and a bag of pickle bites which bore the 7-Eleven logo. In the background of PATTERSON's video, however, there is a sign which reads "Southport."

20. Using Google street view, investigators believe that the video PATTERSON posted was actually taken in the parking lot of a Town Fair Tire store in the Southport section of Fairfield, Connecticut. Additionally, it was determined that the video taken in Connecticut was from the Town Fair Tire location where, as detailed below, surveillance video shows PATTERSON and the other suspects.

21. Having reason to believe that PATTERSON's video was taken in Southport, investigators reviewed surveillance video from a 7-Eleven located at 3232 Post Road in Southport, Connecticut. In reviewing the video from this location, it was determined PATTERSON purchased food there.

22. Employees of the Town Fair Tire recalled a group of individuals arriving at the store at approximately 4:00 a.m. hour on September 16, 2021 in a Toyota with dark tinted windows and purple wheels. The vehicle had a flat tire and the occupants of the vehicle had waited in the parking lot until the tire business opened. This particular Town Fair Tire did not have the replacement tire they required, so the individuals were directed to a Town Fair Tire located at 114 Honeyspot Road in Stratford, Connecticut.

23. Investigators have reviewed video surveillance from the Town Fair Tire in Stratford. In this surveillance these individuals were dressed in clothing which appeared identical to that worn by the burglars; Suspect # 1 (PATTERSON) who emerged from the right rear passenger seat was wearing a dark sweatshirt with a distinct design on the front and back with red showing hanging from the back, black pants with distinct design on the left lower leg and wore black sneakers with a white around the bottom of the soles. Suspect # 2 who emerged from the front passenger seat was wearing a dark t-shirt, dark pants, white socks and black sneakers. Suspect # 3, (unidentified) thin in stature, had brought in a tire from a different

part of the garage and was wearing a dark sweatshirt, had long dreadlocks visible, and was wearing jeans. Suspect # 4 (CRAWFORD) who was driving the vehicle had dreadlocks tied up in the back and was wearing a white shirt, black pants, and black shoes with white visible in the heel, as reflected in the Wrentham surveillance video.

24. On September 17, 2021 at 6:55 a.m., PATTERSON posted another video with the caption "New Jersey." A Waffle House restaurant can be seen in the background. Investigators reviewed Waffle House's website and determined that there are no Waffle House restaurants in New Jersey. Using Google street view, investigators believe that they have located a Waffle House restaurant that matches the one depicted in PATTERSON's video; namely, the Waffle House located at 808 Pulaski Highway in Havre De Grace, Maryland. (This is the same location to which both [redacted] and PATTERSON's phones can be traced that morning).

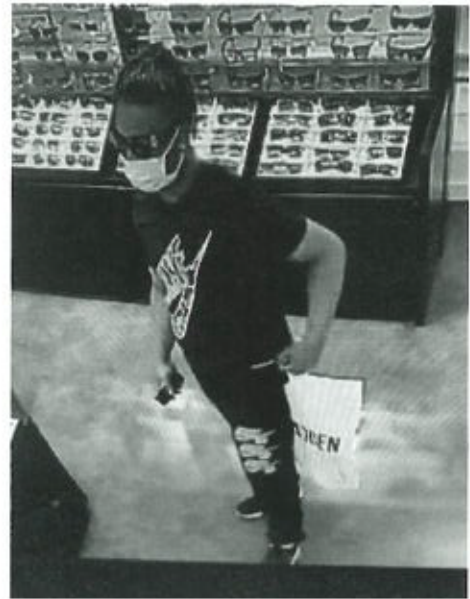
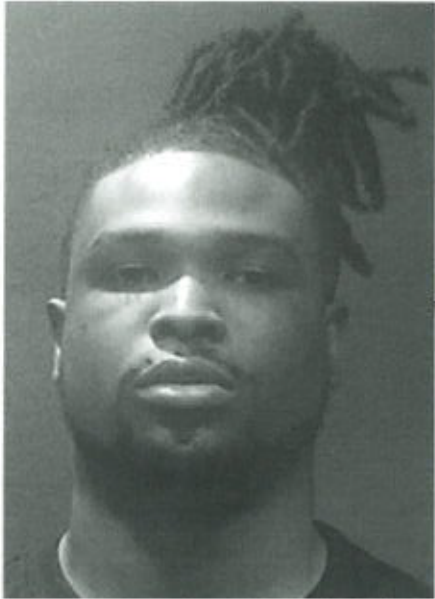
25. Investigators contacted the Security Director for Waffle House restaurants, who provided surveillance images from the Havre de Grace Waffle House. A review of these surveillance images determined that on September 17, 2021 at 6:55 a.m., a black Toyota sedan with dark tinted windows and no front license plate backed into a space in front of the restaurant. Three black males exited the vehicle and entered the restaurant; they were the only patrons inside. These individuals are wearing clothing which appears identical to that worn by the burglars in the Gucci burglary which occurred earlier that morning based upon a review of Wrentham video surveillance. Surveillance images shows one of these males exit the restaurant and walk to the vehicle, where he briefly removes a number of what appear to be Gucci duffle bags, similar to the ones stolen during the burglary.

26. After learning that the subjects had been in Connecticut before the burglary and then traveled to Maryland after the burglary, investigators reviewed surveillance video footage at

the Wrentham Village Outlets to see if the subjects and/or the black Toyota sedan had been at the shopping center prior to the burglary. The Wrentham Village Outlets' inbound LPR video camera shows that on September 15, 2021 at 5:18 p.m. a black Toyota sedan, license plate UFX5712 which appears identical to the one depicted in the Town Fair Tire and Waffle House videos, enter the shopping center. Upon entering the shopping center, the Toyota took a right turn into the lower plaza area out of camera view. In searching the Wrentham Village Outlets' video surveillance, a short period of time later two males are observed walking from the area of the lower plaza towards the main shopping center. Upon entering the center at approximately 5:29 p.m., both suspects walked into the Nike store. A short time later, one suspect exited the store by himself and the other suspect remained in the store. The two eventually met up and at approximately 5:58 p.m. and they both entered the Sunglass Hut store.

27. Surveillance video obtained from the Sunglass Hut showed both suspects holding cell phones in their hands. At approximately 6:01 p.m., both suspects exited the store and walked towards the area of the Gucci store. At approximately 6:09 p.m., both suspects walked from the main shopping center and returned to the lower plaza. At 6:17 p.m., the black Toyota exited the shopping center and took a right onto South Street. When the vehicle exited the mall, it was determined that the license plate on the vehicle was Virginia registration UFX5712.

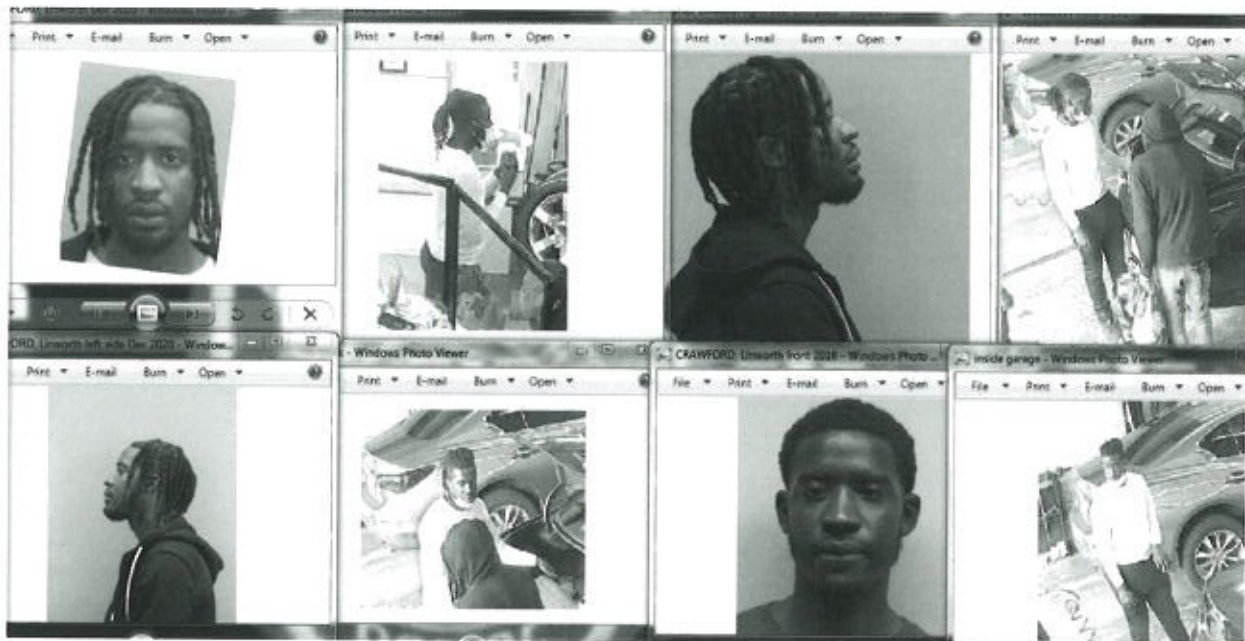
28. In reviewing the video surveillance from the Sunglass Hut store, these two males appeared to be the same black males observed in the Town Fair Tire and Waffle House surveillance. In comparing known images of PATTERSON to the video surveillance from the Sunglass Hut, I believe that PATTERSON is one the subjects in the store. This example below shows a recent known photo of PATTERSON and one from the above mentioned surveillance



sleeve t-shirt; these shirts appeared to be the same as the ones depicted in the other surveillance images.

31. The Investigation determined that Virginia registration UFX5712 is identifiable with a 2007 Toyota, black in color, registered to Precious Tyasia Shartar Onley of 2648 Schult Place in Waldorf, Maryland. Investigators were able to locate recent police reports in which this vehicle was involved in a number of “grab & run” shopliftings in Virginia.

32. Linworth Hayes CRAWFORD has been linked to this Toyota through a review of Virginia police reports. The Leesburg Police obtained booking photos of CRAWFORD from arrests in 2016 and 2020. In comparing the booking images of CRAWFORD to one of the individuals depicted in the surveillance images from Town Fair Tire, I believe that CRAWFORD is one of the individuals depicted. The images described above are directly below.



33. In the surveillance video from the Gucci burglary, one of the burglars is wearing clothing to include but not limited to a white long sleeve white shirt and black pants which appears identical to the clothing worn by CRAWFORD while at Town Fair Tire.

34. Virginia registration UFX5712 was run through the Vigilant Solutions database⁴ and determined the following:

- a. Vigilant had four records of the plate being captured on LPR's in Maryland and Washington, D.C. The license plate was captured by the LPR on Martin Luther King Jr. Avenue in SE Washington, D.C. on December 9, 2020 at 2:33 am. The location of the plate was within a short distance of 2228 Martin Luther King Jr Boulevard, which is an historical address linked to CRAWFORD.

35. Virginia registration UFX5712 was also run through the New York City Police Department's database, which determined that this plate was captured traveling northbound on the George Washington Bridge on September 16, 2021, which is the day prior to the Gucci burglary at 1:20 a.m. The plate was captured traveling southbound over the George Washington Bridge on September 17, 2021 at 3:41 a.m., which is approximately three hours and sixteen minutes after the Gucci burglary.

36. During further investigation of CRAWFORD, a crime analyst from the Leesburg Police Department located an arrest report where CRAWFORD was arrested on October 4, 2021 at 1:30 a.m. by the Liberty County Sheriff's Office in Georgia. The arrest report indicated that CRAWFORD was stopped for speeding, driving 112 MPH. CRAWFORD was subsequently arrested for not having a valid driver's license and marijuana possession. During the booking process, a booking photo of Crawford was taken, and he stated his telephone number was 202-

⁴ According to the Motorola's website, Vigilant PlateSearch LPR software uses "patented analytics and billions of license plate scans from your agency's own cameras, other departments cameras, enterprise partners and a nationwide commercial data network to identify, predict and alert to vehicle sightings." (https://www.motorolasolutions.com/en_us/video-security-access-control/license-plate-recognition-camera-systems/vigilant-platesearch-lpr-analytics-software.html)

492-1380. The booking photo was compared to the surveillance images that were obtained from the Town Fair Tire and investigators came to the conclusion, the person in the surveillance was CRAWFORD. These photos are depicted below.



Additionally, the Leesburg Police Department obtained a police record from the Fairfax County Police Department for a domestic dispute call on September 18, 2021 at 4:13 p.m. (the day after the Gucci burglary in Wrentham). The caller was Linworth CRAWFORD and he called police from telephone number 202-492-1380. CRAWFORD had called the police because the mother of his child had a protective order against him and that she was at his work, Buffalo Wild Wings. A search of telephone number 202-492-1380 showed that it has service through T-Mobile and historical records showed that it was linked to a Shanika Gibson. Telephone number 202-492-1380 appeared in both PATTERSON's and [redacted] hone records multiple times. It was noted that both PATTERSON and [redacted] each had communications with telephone number 202-492-1380 before and after the Gucci Burglary in Wrentham. There were no communications between the three during the time the suspects would be traveling to Wrentham. It is more

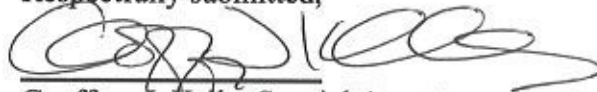
probable than not, the reason for this is because CRAWFORD was with PATTERSON and

75. The Wrentham Police Department subsequently obtained a search warrant from T-Mobile records for telephone number 202-492-1380. The subscriber information was listed to Washington, D.C. 20020. A review of the cellular records showed the phone linked to CRAWFORD had the similar travel patterns from Maryland up to Massachusetts, as the phones linked to [REDACTED] and PATTERSON relative to locations before during and after the burglary at the Gucci store on September 17, 2021. CRAWFORD's phone records show his phone leaving the Capital Heights Maryland area around 7:34 p.m. on September 15, 2021. On September 16, 2021 around 2:16 a.m., CRAWFORD's phone is in Fairfield, Connecticut. Around 3:15 p.m., CRAWFORD's phone is in Stratford, Connecticut. Around 9:16 p.m., CRAWFORD's phone hits off of a cell phone tower on Green St. in Wrentham. The tower location is directly behind the Wrentham Village Outlets and remains in the area through 11:53 p.m. On September 17, 2021 around 6:49 a.m., CRAWFORD's phone is in Havre De Grace, Maryland, and is back in the Washington, D.C. area at 8:58 a.m.

Conclusion

76. Based on the foregoing, I submit there is probable cause to believe that Ronald PATTERSON, Jr, and Linworth Hayes CRAWFORD III committed violations of 18 U.S.C. § 371, conspiracy, and 18 U.S.C. § 2314, transportation of stolen materials in interstate commerce on September 17, 2021 in Wrentham, Massachusetts.

Respectfully submitted,



Geoffrey J. Kelly, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me telephonically this 18 day of November 2021.

Marianne B. Bowler
MARIANNE B. BOWLER
United States Magistrate Judge



